

### REMARKS

The Examiner is thanked for the examination of the application. In view of the foregoing amendments and the remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

According to the present invention, a first control program includes a first API that is configured to receive, with the use of a predefined function, a request relating to an image processing from the second control program. In addition, a second control program includes a second API that is configured to receive, with the use of a function that is publicly released in advance, a request relating to an image processing from an external source.

It is noted that *Mihira* lacks any disclosure that teaches or suggests the above features of the invention. Because of the deficiency, *Mihira* cannot achieve the advantageous effect of the present invention. That is, the image processing apparatus according to the present invention allows easy extension of the functionality to an external source, and that extension is made with no or little alterations to existing applications. In contrast, the image processing apparatus according to *Mihira* totally differs in structure from the present invention and thus cannot achieve the advantageous effect described above.

Claims 1 - 19 are rejected under 35 USC 102(e) or alternatively under 35 USC 103(a), as being allegedly unpatentable over US 2004/0070782, hereinafter *Mihira*.

The Examiner now appears to contend that the applications 31 through 38 of *Mihira* correspond to the claimed first control program. The Examiner also appears to contend that the API 51, API 52 and elements 25 - 27 of *Mihira* correspond to the

claimed second control program. It is noted, however, that both the API 51 and the WSF 27 merely pass to SF 28 a processing request that is received from an external source with the use of SOAP. More importantly, there is no teaching or suggestion in *Mihira* that the elements 25 and 26 are configured to receive, with the use of a function publicly released in advance, a request relating to an image processing from an external source, and which the converts the received request to a command supported by the first API. Thus, the cited portions *Mihira* fail to disclosed that the second control program is configured to pass the received processing request to the first control program. If the Examiner persists with the rejection, the Examiner is respectfully requested to specifically identify where *Mihira* teaches that the elements 25 and 26 are configured to receive, with the use of a function publicly released in advance, a request relating to an image processing from an external source, and which the converts the received request to a command supported by the first API.

Furthermore, independent claims 1, 7, and 13 state that the second control program includes a second API for receiving, with use of a function publicly released in advance, a third request relating to image processing from an external source, and converts the received third request to a command supported by the first API. Claim 18 recites, among other features, that the second control program includes a second API for receiving, with use of a publicly released function, a third request relating to image processing from an external source, and converts the received third request to a command supported by the first API. And, claim 19 adds that the second API is an external API for controlling operations of the hardware resource according to requests received from an external device.

*Mihira* is totally silent on the features that a function is publicly released in advance and that a request relating to image processing is received from an external source using the function.

Accordingly, the Examiner is respectfully requested to reconsider and withdraw the pending rejections, and to find the new claims in condition for allowance.

In the event that there are any questions concerning this Amendment, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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